

ORIGINAL**FILED****08 JUL 11 PM 4:08**CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: _____ DEPUTY

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 as Trustee of SORESENSEN RESEARCH AND
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UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORESENSEN, as Trustee of
 SORESENSEN RESEARCH AND
 DEVELOPMENT TRUST,

Plaintiff

v.

Conair Corporation, a Delaware
 Corporation; and DOES 1 – 100,

Defendants.

Case No. **'08 CV 1256 H LSP**

NOTICE OF RELATED CASES

1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as
2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
3 ("SRDT"), hereby gives notice of cases related to the present case. Specifically,
4 SRD TRUST gives notice of the following related cases that all arise from alleged
5 infringement of United States Patent Number 4,935,184 ("the '184 patent"), whether
6 pending, dismissed, or otherwise terminated:

7
8 **JUDGMENT ENTERED**

9 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
10 *Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed
11 October 30, 2007 in the United States District Court for the Northern District of
12 California. Judgment of \$500,000.00 has been entered.

13 **PENDING – NOT STAYED**

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
15 *Trust v. Phillips Plastics Corp.*, Case No. C08-03094, filed June 26, 2008 in the
16 United States District Court for the District of Northern California. Plaintiff alleges
17 infringement of the '184 patent by Defendants. Consolidation is not recommended
18 at this time.

19 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
20 *Trust v. Human Touch LLC, et al*, Case No. 08cv1080, filed June 18, 2008 in the
21 United States District Court for the District of Southern California. Plaintiff alleges
22 infringement of the '184 patent by Defendants. Consolidation is not yet
23 recommended because it has just been filed.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the
26 United States District Court for the District of Northern California. Plaintiff alleges
27 infringement of the '184 patent by Defendants. Consolidation is not recommended
28 because a requested stay was already denied and this case is proceeding to be

1 litigated.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,
4 filed January 4, 2008 in the United States District Court for the District of Southern
5 California. Plaintiff alleges infringement of the '184 patent by Defendants.
6 Consolidation is not recommended because Defendant is in default and a partial
7 settlement has already been reached.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,
10 2008 in the United States District Court for the District of Northern California.
11 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
12 recommended because there has already been an entry of default and a default
13 judgment motion is being prepared.

14 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case
15 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court
16 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184
17 patent is invalid and not infringed by them, and also makes an unfair trade practices
18 claim. Consolidation is not recommended yet because a Rule 12 motion for transfer
19 for lack of personal jurisdiction is currently pending.

20 *Big Lots Stores, Inc. v. Sorensen Research and Development Trust*, Case. No.
21 08cv00506, filed May 23, 2008 in the United States District Court for the Southern
22 District of Ohio. Plaintiff seeks declaratory judgment that the '184 patent is invalid
23 and not infringed by them. Consolidation is not recommended yet because no
24 summons and complaint have been served, and this case will be the subject of a Rule
25 12 motion for transfer for lack of personal jurisdiction.

26 *Freshlink Product Development, L.L.C. v. Sorensen Research & Development*
27 *Trust*, Case. No. 08cv05021, filed May 30, 2008 in the USDC for the Southern
28 District of New York. Consolidation is not recommended yet because no summons

1 and complaint have been served, and this case will be the subject of a Rule 12
2 motion for transfer for lack of personal jurisdiction.

3 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil
4 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District
5 Court for the District of Columbia. Consolidation is not recommended at this time
6 because no summons and complaint has been served and because there is no personal
7 jurisdiction over Sorensen in this court.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. DMS Holdings, Inc., et al.*, Case No. 08cv559, filed March 25, 2008 in the
10 United States District Court for the District of Southern California. Plaintiff alleges
11 infringement of the '184 patent by Defendants. Consolidation with most other cases
12 in the District of Southern California was recommended (though this case involves
13 different parties and products) because the presiding judge has indicated a preference
14 for a consolidated claim construction hearing.

15 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
16 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the
17 United States District Court for the District of Southern California. Plaintiff alleges
18 infringement of the '184 patent by Defendants. Consolidation with most other cases
19 in the District of Southern California was recommended (though this case involves
20 different parties and products) because the presiding judge has indicated a preference
21 for a consolidated claim construction hearing.

22 **PENDING - STAYED**

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. Metabo Corporation, et al.*, Case No. 08cv304, filed February 15, 2008 in
25 the United States District Court for the District of Southern California. Plaintiff
26 alleges infringement of the '184 patent by Defendants. Consolidation with most
27 other cases in the District of Southern California was recommended (though this case
28 involves different parties and products) because the presiding judge has indicated a

1 preference for a consolidated claim construction hearing.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Star Asia, U.S.A., LLC, et al.*, Case No. 08cv307, filed February 15, 2008 in
4 the United States District Court for the District of Southern California. Plaintiff
5 alleges infringement of the '184 patent by Defendants. Consolidation with most
6 other cases in the District of Southern California was recommended (though this case
7 involves different parties and products) because the presiding judge has indicated a
8 preference for a consolidated claim construction hearing.

9 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
10 *Trust v. Kyocera International, Inc., et al.*, Case No. 08cv411, filed March 4, 2008 in
11 the United States District Court for the District of Southern California. Plaintiff
12 alleges infringement of the '184 patent by Defendants. Consolidation with most
13 other cases¹ in the District of Southern California is recommended (though this case
14 involves different parties and products) because the presiding judge has indicated a
15 preference for a consolidated claim construction hearing.

16 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
17 *Trust v. Central Purchasing, LLC, et al.*, Case No. 08cv309, filed February 15, 2008
18 in the United States District Court for the District of Southern California. Plaintiff
19 alleges infringement of the '184 patent by Defendants. Consolidation with most
20 other cases in the District of Southern California is recommended (though this case
21 involves different parties and products) because the presiding judge has indicated a
22 preference for a consolidated claim construction hearing.

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. Logitech, Inc., et al.*, Case No. 08cv308, filed February 15, 2008 in the
25 United States District Court for the District of Southern California. Plaintiff alleges
26 infringement of the '184 patent by Defendants. Consolidation with most other cases

27 ¹ See Motion for Consolidation, denied as premature, for listing of cases Plaintiff has
28 recommended to be consolidated.

1 in the District of Southern California is recommended (though this case involves
2 different parties and products) because the presiding judge has indicated a preference
3 for a consolidated claim construction hearing.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. Rally Manufacturing, Inc., et al.*, Case No. 08cv302, filed February 15, 2008
6 in the United States District Court for the District of Southern California. Plaintiff
7 alleges infringement of the '184 patent by Defendants. Consolidation with most
8 other cases in the District of Southern California is recommended (though this case
9 involves different parties and products) because the presiding judge has indicated a
10 preference for a consolidated claim construction hearing.

11 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
12 *Trust v. Sunbeam Products, Inc., et al.*, Case No. 08cv306, filed February 15, 2008 in
13 the United States District Court for the District of Southern California. Plaintiff
14 alleges infringement of the '184 patent by Defendants. Consolidation with most
15 other cases in the District of Southern California is recommended (though this case
16 involves different parties and products) because the presiding judge has indicated a
17 preference for a consolidated claim construction hearing.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the
20 United States District Court for the District of Southern California. Plaintiff alleges
21 infringement of the '184 patent by Defendants. Consolidation with most other cases
22 in the District of Southern California is recommended (though this case involves
23 different parties and products) because the presiding judge has indicated a preference
24 for a consolidated claim construction hearing.

25 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
26 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,
27 2008 in the United States District Court for the District of Southern California.
28 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation with

1 most other cases in the District of Southern California is recommended (though this
2 case involves different parties and products) because the presiding judge has
3 indicated a preference for a consolidated claim construction hearing.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in
6 the United States District Court for the District of Southern California. Plaintiff
7 alleges infringement of the '184 patent by Defendants. Consolidation with most
8 other cases in the District of Southern California is recommended (though this case
9 involves different parties and products) because the presiding judge has indicated a
10 preference for a consolidated claim construction hearing.

11 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
12 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,
13 2008 in the United States District Court for the District of Southern California.
14 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation with
15 most other cases in the District of Southern California is recommended (though this
16 case involves different parties and products) because the presiding judge has
17 indicated a preference for a consolidated claim construction hearing.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS
20 POR, filed January 23, 2008 in the United States District Court for the District of
21 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.
22 Consolidation with most other cases in the District of Southern California is
23 recommended (though this case involves different parties and products) because the
24 presiding judge has indicated a preference for a consolidated claim construction
25 hearing.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
27 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,
28 2008 in the United States District Court for the District of Southern California.

1 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation with
2 most other cases in the District of Southern California is recommended (though this
3 case involves different parties and products) because the presiding judge has
4 indicated a preference for a consolidated claim construction hearing.

5 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
6 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed
7 January 11, 2008 in the United States District Court for the District of Southern
8 California. Plaintiff alleges infringement of the '184 patent by Defendants.
9 Consolidation with most other cases in the District of Southern California is
10 recommended (though this case involves different parties and products) because the
11 presiding judge has indicated a preference for a consolidated claim construction
12 hearing.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,
15 2008 in the United States District Court for the District of Southern California.
16 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation with
17 most other cases in the District of Southern California is recommended (though this
18 case involves different parties and products) because the presiding judge has
19 indicated a preference for a consolidated claim construction hearing.

20 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
21 *Trust v. Emerson Electric Co., et al.*, Case No. 3:08-cv-0060-BTM-CAB, filed
22 January 10, 2008 in the United States District Court for the District of Southern
23 California. Plaintiff alleges infringement of the '184 patent by Defendants.
24 Consolidation with most other cases in the District of Southern California is
25 recommended (though this case involves different parties and products) because the
26 presiding judge has indicated a preference for a consolidated claim construction
27 hearing.

28 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*

1 *Trust v. Energizer Holdings, Inc., et al*, Case No. 3:07-CV-2321-BTM-CAB, filed
2 December 11, 2007 in the United States District Court for the Southern District of
3 California. Plaintiff alleges infringement of the '184 patent by Defendants.
4 Consolidation with most other cases in the District of Southern California is
5 recommended (though this case involves different parties and products) because the
6 presiding judge has indicated a preference for a consolidated claim construction
7 hearing.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Giant International, Inc., et al*, Case No. 3:07-CV-2121-BTM-CAB, filed
10 November 6, 2007 in the United States District Court for the Southern District of
11 California. Plaintiff alleges infringement of the '184 patent by Defendants.
12 Consolidation with most other cases in the District of Southern California is
13 recommended (though this case involves different parties and products) because the
14 presiding judge has indicated a preference for a consolidated claim construction
15 hearing.

16 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
17 *Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December
18 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent by
19 Defendants. Consolidation with most other cases in the District of Southern
20 California is recommended (though this case involves different parties and products)
21 because the presiding judge has indicated a preference for a consolidated claim
22 construction hearing.

23 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
24 *Helen of Troy Texas Corporation, et al*, Case No. 3:07-cv-2278-BTM-CAB, filed
25 December 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent
26 by Defendants. Consolidation with most other cases in the District of Southern
27 California is recommended (though this case involves different parties and products)
28 because the presiding judge has indicated a preference for a consolidated claim

1 construction hearing.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 3 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed
 4 November 1, 2007 in the United States District Court for the Northern District of
 5 California. Plaintiff alleges infringement of the '184 patent by Defendants.
 6 Consolidation is not recommended because this related case involves different
 7 parties and has different, unrelated products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 9 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-
 10 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern
 11 District of California. Plaintiff alleges infringement of the '184 patent by
 12 Defendants. Consolidation with most other cases in the District of Southern
 13 California is recommended (though this case involves different parties and products)
 14 because the presiding judge has indicated a preference for a consolidated claim
 15 construction hearing.

16 SETTLED AND DISMISSED

17 *Jens Erik Sorensen as Trustee of the Sorensen Research And Development*
 18 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
 19 MLS, filed September 18, 2006 in the Southern District of California. The action
 20 was settled by the parties, and dismissed.

21 *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
 22 *Trust v. Head USA Inc.* Civil Case No.: 06CV1434BTN CAB, filed July 2006 in
 23 the Federal District for the Southern District of California. The action was settled by
 24 the parties, and dismissed.

25 *Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research*
 26 *And Development Trust), and Sorensen Research And Development Trust.* Docket
 27 No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter
 28 was transferred and consolidated with the *Sorensen Research And Development*

1 *Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case
2 No.: 06CV1434BTM CAB. The action was later settled by the parties, and
3 dismissed.

4 *Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen*
5 *Research and Development Trust.* Docket No. 1:06-cv-91-JM filed March 8, 2006 in
6 the Federal District of New Hampshire. The matter was transferred and consolidated
7 with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
8 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.,* Civil Case No. 06CV1941 B
9 MLS, filed in the Southern District of California. The action was later settled by the
10 parties.

11 *Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen*
12 *Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA,*
13 *LLC.* Civil No. 03-1763 (HAA) filed in the United States District Court for
14 Northern California and transferred to the United States District Court for New
15 Jersey. This matter has been settled and dismissed.

16 *In the Matter of Certain Automobile Tail Light Lenses And Products*
17 *Incorporating Same.* Investigation No. 337-TA-502 filed in the United States
18 International Trade Commission. The matter was remanded after appeal to the
19 Federal Circuit Court of Appeals, then settled and dismissed.

20 *Jens E. Sorensen, as Trustee Of The Sorensen Research and Development*
21 *Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd.* Case
22 No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District
23 of California. The matter was settled and dismissed.

24 *Sorensen et al v. International Trade Commission et al.,* 427 F.3d 1375 (Fed.
25 Cir. 2005). After the Federal Circuit ruled in patentee's favor, the parties settled and
26 dismissed.

27 **DISMISSED**

28 *DMS Holdings, Inc. v. Sorensen Research & Development Trust.* Civil Case

1 No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the
2 Northern District of Illinois. This case has been dismissed. Sorensen refiled against
3 DMS Holdings in the United States District Court for Southern California (see
4 above).

5 *Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.*
6 Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western
7 District of North Carolina. The matter was never served and was dismissed.

8 *Digital Innovations LLC v. Sorensen Research and Development Trust.* Case
9 No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern
10 District of Illinois. The matter was never served and was dismissed.

11 *Big Lots v. Sorensen Research and Development Trust.* Case No. 2:06-cv-
12 1089, filed December 29, 2006 in the Federal Court for the Southern District of
13 Ohio. The matter was never served and was dismissed.

14 *Bon-Aire v. Sorensen Research and Development Trust.* Case No. 07-cv-054-
15 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was
16 never served and was dismissed.

17 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*
18 *Trust.* CIV. NO. CV106-160 in the Federal Court for the Southern District of
19 Georgia on October 30, 2006. The matter was never served and was dismissed.

20 DATED this Friday, July 11, 2008.

21
22 JENS ERIK SORENSEN, as Trustee of
23 SORENSEN RESEARCH AND DEVELOPMENT
24 TRUST, Plaintiff

25 /s/

26 Melody A. Kramer, Esq.

27 J. Michael Kaler

28 Attorneys for Plaintiff